

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

KENNETH DAVIDSON AND JANA
DAVIDSON, INDIVIDUALLY AND ON
BEHALF OF THE THEIR MINOR CHILDREN
JCD AND KSD, AND THOMAS FARMER

VERSUS

ROCKWELL INTERNATIONAL CORPORATION*
ET AL *

* CIVIL ACTION NO. 4:15-cv-00827

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DECLARATION OF JONATHAN E. MITCHELL

I, Jonathan E. Mitchell, declare as follows:

1. I am an attorney at the law firm of deGravelles, Palmintier, Holthaus & Fruge, LLP and counsel of record for plaintiffs, Kenneth and Jana Davidson, individually and on behalf of their minor children, JCD and KSD, and Thomas Farmer. I am over the age of 21, I am of sound mind, and I am competent to make this Declaration. This Declaration is based on my personal knowledge of the matters stated herein. I make this Declaration in support of plaintiffs' Opposition To Motion To Exclude Opinions, Report, and Proposed Testimony of Don Hansen.
2. Attached as Exhibit A is a true and correct copy of the Expert Report of Don Hansen.
3. Attached as Exhibit B is a true and correct copy of excerpts of the Deposition of Paul J. Dziorny, which was taken on Wednesday, June 8, 2016, in Frederick, Maryland.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 26, 2016.



JONATHAN E. MITCHELL